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January 21, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Secretary
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Re: CC Docket No. 95-116 (Telephone Number Portability)
Ex Parte Presentation

Dear Ms. Salas:

On behalf of the Rural Cellular Association (RCA), we are submitting an original and one (1) copy of this letter to inform the Commission that on January 20, 1999, RCA representatives Jackie N. Dukes, Scott Parker, John McMillan, Marci Greenstein and Thomas Smith met with the following Commission staff members to discuss RCA's position on the issues raised in this proceeding, which are a matter of record before the Commission:

Mr. Steve Weingarten, Chief, Commercial Wireless Division;
Commissioner Susan Ness and Mr. Dan Connors; and
Ms. Karen Gulick of Commissioner Gloria Tristani's office.

In accordance with the ex parte rules, attached is a copy of the material provided to Commission participants during the meeting which summarizes RCA's position and presentation.

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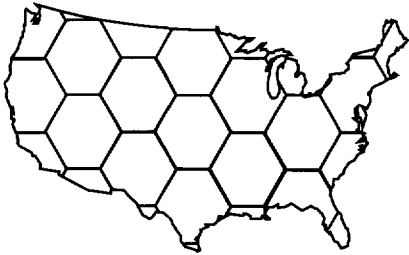
Should there be any questions concerning this matter, please contact this office.

Very truly yours,


Sylvia Lesse

SL/cvh
Attachments

cc (w/o attachments): Steve Weingarten (Chief, Commercial Wireless Division)
Commissioner Susan Ness and Dan Connors
Karen Gulick (Commissioner Tristani)



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LOCAL NUMBER PORTABILITY

Local Number Portability ("LNP") refers to the ability of subscribers to maintain their telephone numbers when they change carriers. The Federal Communications Commission is requiring the wireless industry to make extremely costly changes to their systems in order to make LNP available to all customers everywhere.

The burden of such system changes on small, rural wireless carriers and their customers is enormous. (Industry-wide, the cost is estimated to be a billion dollars.) Ironically, the goal of full LNP implementation - a more competitive wireless industry - can be achieved sooner if carriers are allowed to use their resources to make network improvements rather than devote most or all of their resources to number portability.

PETITION FOR FORBEARANCE

A cellular industry petition to forbear, or not enforce, implementation of wireless service provider LNP until at least the end of the five-year personal communications services ("PCS") build-out period is before the Federal Communications Commission. (WT Docket No. 98-229).

The FCC extended until March 16, 1999 its deadline for deciding whether to postpone implementation of wireless service provider LNP in order to take into consideration a recent report of the North American Numbering Council ("NANC") on the conservation and use of numbering resources.

RCA POSITION

Small and rural wireless licensees support the petition for forbearance for two reasons. First, competition in the CMRS market is flourishing despite the lack of LNP requirements. Second, small wireless carriers' limited financial resources are better spent on network construction and marketing than on implementation of LNP requirements.

RCA is an association representing the interests of small and rural wireless licensees providing commercial services to subscribers throughout the nation. Its member companies provide service to predominantly rural areas where more than 6 million people reside. Formed in 1993 to address the distinctive issues facing rural cellular service providers, the membership of RCA currently includes rural PCS carriers as well.